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January 27, 2022

**Via E-Filing**

The Honorable Colm F. Connolly  
United States District Court, District of Delaware  
844 N. King Street  
Wilmington, Delaware 19801

**Re: *Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis*  
*v. Key Commercial Finance, LLC, et. al.,*  
No. 1:18-cv-01516-CFC**

Dear Chief Judge Connolly,

I represent Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis ("Estate"). At an April 15, 2021 hearing in this matter, the Court suggested that a representative of Watchtower Bible and Tract Society of New York, Inc. ("Watchtower") attend the pre-trial conference, scheduled for February 1, 2022, at 3 p.m. Richard D. Moake, Esq., Watchtower's General Counsel, is prepared to participate in the pre-trial conference. However, the community in which Mr. Moake resides is currently under a lockdown due to the Covid pandemic, and he is not able to physically attend the pre-trial conference. Given the circumstances, Mr. Moake respectfully requests that the Court allow him to participate virtually, via a Zoom video conference or a similar application. He asked that the Estate make this request on his behalf.

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We have consulted with counsel for Defendants, and they do not object to Mr. Moake's appearance at the pre-trial conference virtually. We appreciate the Court's consideration of this request.

Respectfully,

*/s/ Joelle E. Polesky*

Joelle E. Polesky (ID No. 3694)

cc: Theodore A. Kittila, Esquire (via email)  
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